

JS 44 (Rev. 12/07, NJ 5/08)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

AMANDA SNYDER

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire  
Kimmel & Silverman, P.C.  
30 E. Butler Pike  
Ambler, PA 19002  
(215) 540-8888

## DEFENDANTS

NCO FINANCIAL SYSTEMS, INC.

County of Residence of First Listed Defendant \_\_\_\_\_

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	Citizen of Another State	PTF	DEF
<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	
			<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State
			<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation
				<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
				<b>SOCIAL SECURITY</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
				<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions

## V. ORIGIN

(Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:  
Fair Debt Collection Practices Act

## VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

## DEMANDS

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

## VIII. RELATED CASE(S)

(See instructions): JUDGE

DOCKET NUMBER

Explanation:

DATE

SIGNATURE OF ATTORNEY OF RECORD

4/15/11

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA -- DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 2511 Hutchinson Branch Road, Kenova, WV 25530

Address of Defendant: 507 Prudential Road, Harshaw, PA 19044

Place of Accident, Incident or Transaction:

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes  No

Does this case involve multidistrict litigation possibilities?

Yes  No

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_

Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes  No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes  No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes  No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes  No

CIVIL: (Place  in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1.  Indemnity Contract, Marine Contract, and All Other Contracts
2.  FELA
3.  Jones Act-Personal Injury
4.  Antitrust
5.  Patent
6.  Labor-Management Relations

B. *Diversity Jurisdiction Cases:*

1.  Insurance Contract and Other Contracts
2.  Airplane Personal Injury
3.  Assault, Defamation
4.  Marine Personal Injury
5.  Motor Vehicle Personal Injury
6.  Other Personal Injury (Please specify)

7.  Civil Rights

7.  Products Liability

8.  Habeas Corpus

8.  Products Liability — Asbestos

9.  Securities Act(s) Cases

9.  All other Diversity Cases

10.  Social Security Review Cases

(Please specify)

11.  All other Federal Question Cases 15 U.S.C. 1492

(Please specify)

Craig Thor Kimmel

ARBITRATION CERTIFICATION

(Check Appropriate Category)

counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 4/15/11

Craig Thor Kimmel

Attorney-at-Law

57100

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/15/11

Craig Thor Kimmel

Attorney-at-Law

57100

Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Amanda Snyder : CIVIL ACTION  
v. :  
NCO Financial Systems, Inc. : NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

(a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )

(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )

(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )

(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )

(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )

(f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

4/15/11  
Date

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Telephone

FAX Number

E-Mail Address

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

AMANDA SNYDER, )  
Plaintiff )  
v. )  
NCO FINANCIAL SYSTEMS, INC., )  
Defendant )  
Case No.: )  
COMPLAINT AND DEMAND FOR )  
JURY TRIAL )  
(Unlawful Debt Collection Practices)

**COMPLAINT**

AMANDA SNYDER ("Plaintiff"), by her attorneys, KIMMEL & SILVERMAN, P.C.,  
alleges the following against NCO FINANCIAL SYSTEMS, INC. ("Defendant"):

## INTRODUCTION

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").

## JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy," and 28 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising under the laws of the United States.

3. Defendant conducts business and has an office in the Commonwealth of Pennsylvania and therefore, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).

5. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.

## PARTIES

6. Plaintiff is a natural persons residing in Kenova, West Virginia 25530.

7. Plaintiff is a "consumer" as that term is defined by 15 U.S.C. § 1692a(3).

8. Defendant is a national debt collection company with corporate headquarters at 507 Prudential Road in Horsham, Pennsylvania, 19044.

located at 507 Prudential Road in Horsham, Pennsylvania, 19044.

9. Defendant is a "debt collector" as that term is defined by 15 U.S.C. § 1692a(6), and attempted to collect a consumer debt from Plaintiff.

10. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

## PRELIMINARY STATEMENT

11. The Fair Debt Collection Practices Act ("FDCPA") is a comprehensive statute, which prohibits a catalog of activities in connection with the collection of debts by third parties.

See 15 U.S.C. § 1692 *et seq.* The FDCPA imposes civil liability on any person or entity that violates its provisions, and establishes general standards of debt collector conduct, defines abuse, and provides for specific consumer rights. 15 U.S.C. § 1692k. The operative provisions of the FDCPA declare certain rights to be provided to or claimed by debtors, forbid deceitful and misleading practices, prohibit harassing and abusive tactics, and proscribe unfair or unconscionable conduct, both generally and in a specific list of disapproved practices.

12. In particular, the FDCPA broadly enumerates several practices considered contrary to its stated purpose, and forbids debt collectors from taking such action. The substantive heart of the FDCPA lies in three broad prohibitions. First, a "debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt." 15 U.S.C. § 1692d. Second, a "debt

1 collector may not use any false, deceptive, or misleading representation or means in connection  
2 with the collection of any debt.” 15 U.S.C. § 1692e. And third, a “debt collector may not use  
3 unfair or unconscionable means to collect or attempt to collect any debt.” 15 U.S.C. § 1692f.  
4 The FDCPA is designed to protect consumers from unscrupulous collectors, whether or not there  
5 exists a valid debt, broadly prohibits unfair or unconscionable collection methods, conduct which  
6 harasses, oppresses or abuses any debtor, and any false, deceptive or misleading statements in  
7 connection with the collection of a debt.

8 13. In enacting the FDCPA, the United States Congress found that “[t]here is  
9 abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many  
10 debt collectors,” which “contribute to the number of personal bankruptcies, to marital instability,  
11 to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. § 1692a. Congress  
12 additionally found existing laws and procedures for redressing debt collection injuries to be  
13 inadequate to protect consumers. 15 U.S.C. § 1692b.

14. Congress enacted the FDCPA to regulate the collection of consumer debts by debt  
15 collectors. The express purposes of the FDCPA are to “eliminate abusive debt collection  
16 practices by debt collectors, to insure that debt collectors who refrain from using abusive debt  
17 collection practices are not competitively disadvantaged, and to promote consistent State action  
18 to protect consumers against debt collection abuses.” 15 U.S.C. § 1692e.

## 20 FACTUAL ALLEGATIONS

21 15. At all relevant times, Defendant was attempting to collect an alleged consumer  
22 debt from Plaintiff on behalf of Cabell Huntington Hospital.

23 16. The alleged debt at issue arose out of transactions, which were primarily for  
24 personal, family, or household purposes.

1       17. On April 26, 2010, upon information and belief, a representative from Cabell  
2 Huntington Hospital contacted Plaintiff's husband, Thomas Snyder, and requested that he have  
3 his wife contact Defendant in regard to alleged debt.

4       18. On that same day, at approximately 1:30 p.m., Plaintiff contacted Defendant and  
5 spoke with a representative named "Darenda."

6       19. "Darenda" informed Plaintiff she owed \$2065.96 and that she only had two (2)  
7 options, both which required her to repay the alleged debt: (1) agree to have \$172.16 debited  
8 from her bank account each month for twelve (12) months; or (2) obtain a loan from another  
9 source to pay the alleged debt.  
10

11       20. Plaintiff, unaware of her rights, informed Defendant that she would not allow  
12 Defendant to withdraw money from her bank account, but stated that she could write a monthly  
13 check to Defendant.

14       21. In response, Defendant's representative, "Darenda," became rude, threatening  
15 Plaintiff that she only had until April 29, 2010, to decide how she was going to pay this debt,  
16 otherwise Plaintiff's account would be turned over to Defendant's legal department.

17       22. Upon information and belief, Defendant threatened to garnish Plaintiff's wages  
18 for the unpaid debt.

19       23. Plaintiff did not make any payments on the alleged debt or to Defendant.

20       24. To date, despite threats to the contrary, Defendant has not filed a lawsuit or taken  
21 other legal action against Plaintiff; thereby indicating it did not intend to take the action  
22 previously threatened.  
23

24       25. Within five (5) days of its initial communication with Plaintiff on April 26, 2010,  
25 Defendant failed to send Plaintiff written correspondence notifying her of her rights to dispute

1 the debt and/or request verification of the debt.

2 26. To date, Plaintiff still not received any written correspondence from Defendant  
3 notifying her of her rights to dispute and/or request verification of the alleged debt.

4 27. Upon information and belief, Defendant sought to collect a debt from Plaintiff  
5 despite the fact that it had no knowledge of its validity.

6 28. Defendant's actions in attempting to collect the alleged debt were harassing,  
7 abusive and highly deceptive.

#### 9 CONSTRUCTION OF APPLICABLE LAW

10 29. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry, deLaunay &  
11 Durand, 103 F.3d 1232 (5th Cir. 1997). "Because the Act imposes strict liability, a consumer  
12 need not show intentional conduct by the debt collector to be entitled to damages." Russell v.  
13 Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996); see also Gearing v. Check Brokerage Corp., 233  
14 F.3d 469 (7th Cir. 2000) (holding unintentional misrepresentation of debt collector's legal status  
15 violated FDCPA); Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

16 30. The FDCPA is a remedial statute, and therefore must be construed liberally in  
17 favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235 (W.D. Wash. 2006). The  
18 remedial nature of the FDCPA requires that courts interpret it liberally. Clark v. Capital Credit  
19 & Collection Services, Inc., 460 F. 3d 1162 (9th Cir. 2006). "Because the FDCPA, like the  
20 Truth in Lending Act (TILA) 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be  
21 construed liberally in favor of the consumer." Johnson v. Riddle, 305 F. 3d 1107 (10th Cir.  
22 2002).

23 31. The FDCPA is to be interpreted in accordance with the "least sophisticated"  
24 consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168 (11th Cir. 1985); Graziano

1 v. Harrison, 950 F. 2d 107 (3<sup>rd</sup> Cir. 1991); Swanson v. Southern Oregon Credit Service, Inc.,  
 2 869 F.2d 1222 (9th Cir. 1988). The FDCPA was not “made for the protection of experts, but for  
 3 the public - that vast multitude which includes the ignorant, the unthinking, and the credulous,  
 4 and the fact that a false statement may be obviously false to those who are trained and  
 5 experienced does not change its character, nor take away its power to deceive others less  
 6 experienced.” Id. The least sophisticated consumer standard serves a dual purpose in that it  
 7 ensures protection of all consumers, even naive and trusting, against deceptive collection  
 8 practices, and protects collectors against liability for bizarre or idiosyncratic interpretations of  
 9 collection notices. Clomon, 988 F. 2d at 1318.

11

**COUNT I**  
 12 **DEFENDANT VIOLATED THE**  
 13 **FAIR DEBT COLLECTION PRACTICES**  
 14 **ACT**

15 32. In its actions to collect a disputed debt, Defendant violated the FDCPA in one or  
 16 more of the following ways:

- 17 a. Defendant violated of the FDCPA generally;
- 18 b. Defendant violated §1692d of the FDCPA by harassing Plaintiff in  
 19 connection with the collection of an alleged debt;
- 20 c. Defendant violated §1692e of the FDCPA by using false, deceptive, or  
 21 misleading representations or means in connection with the collection of a  
 22 debt;
- 23 d. Defendant violated §1692e(4) of the FDCPA by representing or implicating  
 24 that nonpayment of any debt will result in the garnishment of wages, when  
 25 such action was not lawful and/or Defendant did not intend to take such

1 action;

2 e. Defendant violated §1692e(5) of the FDCPA by threatening to take action  
3 that cannot legally be taken or that is not intended to be taken;

4 f. Defendant violated §1692e(10) of the FDCPA by using false representations  
5 or deceptive means to collect or attempt to collect a debt;

6 g. Defendant violated §1692f of the FDCPA by using unfair and unconscionable  
7 means with Plaintiff to collect or attempt to collect a debt;

8 h. Defendant violated §1692g of the FDCPA by failing to send written  
9 notification, within five (5) days after its initial communication with Plaintiff,  
10 advising Plaintiff of her rights to dispute the debt or request verification of the  
11 debt; and

12 i. Defendant acted in an otherwise deceptive, unfair and unconscionable manner  
13 and failed to comply with the FDCPA.

14 WHEREFORE, Plaintiff, AMANDA SNYDER, respectfully prays for a judgment as  
15 follows:

16 a. All actual compensatory damages suffered pursuant to 15 U.S.C. §  
17 1692k(a)(1);

18 b. Statutory damages of \$1,000.00 for the violation of the FDCPA pursuant to  
19 15 U.S.C. § 1692k(a)(2)(A);

20 c. All reasonable attorneys' fees, witness fees, court costs and other litigation  
21 costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and

22 d. Any other relief deemed appropriate by this Honorable Court.

23

24

**DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that Plaintiff, AMANDA SNYDER, demands a jury trial in this case.

RESPECTFULLY SUBMITTED,

KIMMEL & SILVERMAN, P.C.

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